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6 Attorneys for Plaintiff
United States of America
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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SARAH ANDERSON,
FABIAN GOMEZ,
15 EPIFANIO RAMIREZ,
WENDY LABUDA,
16 WILLIAM OWEN,
JOALEEN ROGERS,
17

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: February 27, 2023

TIME: 9:00 a.m.

COURT: Hon. William B. Shubb

19 STIPULATION

20 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
21 through defendant's counsel of record, hereby stipulate as follows:

22 1. This case is set for a status conference on February 27, 2023.

23 2. By this stipulation, defendants now move to continue the status conference until April 3,
24 2023 at 9:00 a.m., and to exclude time between February 27, 2023, and April 3, 2023, under 18 U.S.C.
25 § 3161(h)(7)(A), B(iv) [Local Code T4].

26 3. The parties agree and stipulate, and request that the Court find the following:

27 a) The government has produced discovery in this matter, consisting of over 1,300
28 pages of investigative reports and photographs. The government is also in the process of making

available to the defense video surveillance evidence for multiple controlled drug buys.

b) Counsel for defendants have met with their clients to discuss their respective cases. Defense counsel desire additional time to conduct investigation into the charges, the alleged roles of their respective clients, and to review discovery in this case. Defense counsel will need additional time to discuss potential resolutions with their clients, prepare pretrial motions, and otherwise prepare for trial.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 27, 2023 to April 3, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 22, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

Dated: February 22, 2023

[*Signatures continue on following page.*]

/s/ DANIEL B. OLMOS

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DANIEL B. OLMOS
Counsel for Defendant
SARAH ANDERSON,

Dated: February 22, 2023

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

Dated: February 22, 2023

/s/ OLAF HEDBERG
OLAF HEDBERG
Counsel for Defendant
EPIFANIO RAMIREZ

Dated: February 22, 2023

/s/ TASHA CHALFANT
TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

Dated: February 22, 2023

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

Dated: February 22, 2023

/s/ TAMARA SOLOMON
TAMARA SOLOMON
Counsel for Defendant
JOALEEN ROGERS,

ORDER

IT IS SO FOUND AND ORDERED.

Dated: February 22, 2023


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE